

Carolyn Smith, et al. v. Jefferson County, Mississippi, et al.

Bonita Blake

April 18, 2025

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EXHIBIT 7

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
WESTERN DIVISION

CAROLYN SMITH, ET AL

PLAINTIFFS

V. CIVIL ACTION NO. 5:24-CV-0072-DCB-ASH

JEFFERSON COUNTY,
MISSISSIPPI, ET AL

DEFENDANTS

DEPOSITION OF BONITA BLAKE

Taken at the instance of the Defendants at the Law
Offices of Carroll Rhodes, 119 Downing Street,
Hazlehurst, Mississippi 39083, on Friday,
April 18, 2025,
beginning at 11:26 a.m.

REPORTED BY:

ROBIN G. BURWELL, CCR #1651

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<p>1 APPEARANCES:</p> <p>2</p> <p>3 CARROLL RHODES, ESQ.</p> <p>4 Law Offices of Carroll Rhodes</p> <p>5 Post Office Box 588</p> <p>6 Hazlehurst, Mississippi 39083</p> <p>7 crhode@bellsouth.net</p> <p>8</p> <p>9 COUNSEL FOR PLAINTIFF</p> <p>10</p> <p>11 THOMAS L. CARPENTER, ESQ.</p> <p>12 Wise, Carter, Child & Caraway</p> <p>13 2510 14th Street, Suite 1125</p> <p>14 Gulfport, Mississippi 39501</p> <p>15 tlc@wisecarter.com</p> <p>16</p> <p>17 COUNSEL FOR DEFENDANT</p> <p>18</p> <p>19 ALSO PRESENT:</p> <p>20 Carolyn Smith</p> <p>21 Shaquita McComb</p> <p>22 Sandra Sanders</p> <p>23 James Ellis, Jr.</p> <p>24</p> <p>25</p>	<p>1 BONITA BLAKE,</p> <p>2 having been first duly sworn, was examined and</p> <p>3 testified as follows:</p> <p>4 EXAMINATION BY MR. CARPENTER:</p> <p>5 Q. Ms. Blake, I'm Tom Carpenter. And</p> <p>6 you've been here, so you've heard it all before.</p> <p>7 MR. CARPENTER: So, we'll just go with</p> <p>8 the usual stipulations and read and sign.</p> <p>9 MR. RHODES: Yes.</p> <p>10 Q. (By Mr. Carpenter) Because you know</p> <p>11 what that is by now.</p> <p>12 So, we'll get started straight away with</p> <p>13 your name, if you could give us that?</p> <p>14 A. Bonita Blake.</p> <p>15 Q. And what's your address?</p> <p>16 A. 5247 Red Lick Road, Lorman, Mississippi</p> <p>17 39096.</p> <p>18 Q. And that's here in Jefferson County?</p> <p>19 A. Yes.</p> <p>20 Q. Because I know Lorman can kind of creep</p> <p>21 into another county.</p> <p>22 A. Claiborne.</p> <p>23 Q. Claiborne, that's right.</p> <p>24 And what do you do currently?</p> <p>25 A. I work at Tigers Den. And about a week</p>
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<p>1 INDEX</p> <p>2 Style.....1</p> <p>3 Appearances.....2</p> <p>4 Index3</p> <p>5 Certificate of Deponent44</p> <p>6 Certificate of Court Reporter45</p> <p>7 EXAMINATIONS</p> <p>8 Examination By Mr. Carpenter4</p> <p>9 Examination By Mr. Rhodes39</p> <p>10 Examination By Mr. Carpenter41</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 ago I started working at the Sheriff's Department</p> <p>2 in Port Gibson.</p> <p>3 Q. Okay. From January the 1st of last</p> <p>4 year, 2024, to now, what was your first job?</p> <p>5 A. I was working at the elementary school.</p> <p>6 Q. Okay. When did that start?</p> <p>7 A. February of 2024.</p> <p>8 Q. Got it.</p> <p>9 A. And ended in April of 2024.</p> <p>10 Q. Okay. And how much were you making</p> <p>11 there?</p> <p>12 A. They say \$10.</p> <p>13 Q. Okay. They say.</p> <p>14 A. But it wasn't no \$10.</p> <p>15 Q. Right. I joke, and I sure don't want to</p> <p>16 start a family dispute, but we can ask Ms. Smith.</p> <p>17 She's right behind us. President of the school</p> <p>18 board can answer that question for you. But we'll</p> <p>19 do that on another day.</p> <p>20 And what were you making at the</p> <p>21 correctional facility?</p> <p>22 A. \$10.41.</p> <p>23 Q. And in February of '24, where did you --</p> <p>24 what was your next job?</p> <p>25 A. Nothing, until this year.</p>

2 (Pages 2 to 5)

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<p>1 Q. How about Tigers Den, when did that 2 start? 3 A. This year, 2025. 4 Q. And what is Tigers Den? 5 A. A food stand. 6 Q. And how much were you making there? 7 A. 8.75. 8 Q. And how long was that job? 9 A. I'm currently working, currently. 10 Q. But you've got an upcoming job? 11 A. I have two jobs at the same time. 12 Q. Gotcha. 13 So you're still working for Tigers, and 14 then you're also -- what's the job that you just 15 got? 16 A. Jailer at the Sheriff's Department in 17 Claiborne County. 18 Q. Okay. Port Gibson? 19 A. Yes, sir. 20 Q. Okay. And how much are you making 21 there? 22 A. \$11. 23 Q. Got it. And so between April of '24 and 24 January '25, it looks like you weren't working? 25 A. No, I wasn't.</p>	<p>1 A. Yes, sir. 2 Q. And so then you got to have C and D to 3 fill the week in that you're off? 4 A. Yes, sir. 5 Q. And so at the end of two-week period, 6 you might have 80 hours in from the first week, 7 but it balances out to 40 hours a week -- 8 A. Yes. 9 Q. -- over the two weeks? 10 Gotcha. Firefighters do the same thing. 11 All right. Let's see. And what is 12 current age? 13 A. 49. 14 Q. And when did you graduate from high 15 school? 16 A. May of 1994. 17 Q. Okay. Was it here in Jefferson County? 18 A. Yes, sir, it was. 19 Q. And did you go on to college? 20 A. No, sir, I didn't. 21 Q. Okay. As part of -- and I know I didn't 22 ask this from others. But as part of the training 23 as a correctional officer, did you have to go to 24 something like the LEA, Law Enforcement Academy or 25 something?</p>
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<p>1 Q. And what were you doing in terms of 2 looking for work? 3 A. I did applications and I went into 4 businesses asking about a job. I did a 5 application at the Family Dollar Tree in Fayette. 6 I did one at the supermarket. And that's it. 7 Q. Okay. And I didn't ask this of the 8 other -- of everybody else, but I think it's going 9 to apply to everybody. For \$10.45 an hour, was 10 that 40-hour a week, overtime. What would a 11 typical number of hours be for working at the 12 Facility? 13 A. It was like seven days on, seven days 14 off. 15 Q. So it worked out to be -- when you 16 say -- so you're doing -- 17 A. It was like we made 86 hours, you know, 18 every pay period. So it was like 43 hours every 19 week. 20 Q. Yeah, now I follow you. 21 So that's why there's A, B, C, D? 22 A. Yes, sir. 23 Q. Because you might have an A and B shift, 24 day shift, night shift, but then y'all are off for 25 a week.</p>	<p>1 A. Yes. We went under Sheriff Walker. 2 Q. Got it. 3 Do you get a certification for going to 4 LEA? 5 A. Yeah, we got certified. Yes, sir. 6 Q. And so when you started back with 7 Claiborne County, do you have to get recertified 8 there? 9 A. No. I didn't have to get certified. 10 Q. In other words, it sticks around for a 11 while, the certification? 12 A. Yes. 13 Q. I think in this case you didn't see any 14 medical providers? 15 A. No. 16 Q. That's why everyone is joking about you 17 being shorter than everyone else, because we don't 18 have 20 or so pages to go through. 19 All right. Looking -- there's some 20 questions about pumping gas and some things like 21 that. 22 A. Yes, sir. 23 Q. So we'll cover that. We'll start on 24 that. 25 As I understand it, you started in</p>

3 (Pages 6 to 9)

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<p>1 December of 2020?</p> <p>2 A. Yes, sir, I did.</p> <p>3 Q. All right. And what was your --</p> <p>4 A. December the 16th of 2020.</p> <p>5 Q. Got it.</p> <p>6 And when you were there, you were</p> <p>7 correctional officer?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Did you have a particular function, like</p> <p>10 tower operator with Ms. McComb, or was it a just a</p> <p>11 general CO?</p> <p>12 A. Well, I had different -- we did</p> <p>13 different -- we didn't just have one title because</p> <p>14 you could work the tower or you could work the</p> <p>15 floor. So, I did control three. I worked control</p> <p>16 three, four, one in tower.</p> <p>17 Q. And when you say three, four and one,</p> <p>18 what positions would they be?</p> <p>19 A. Control one is the tower operator.</p> <p>20 Q. Okay.</p> <p>21 A. Control three is a tower operator.</p> <p>22 Q. Okay.</p> <p>23 A. Control four is a tower operator.</p> <p>24 Control two is where all the officers</p> <p>25 sit and monitor the zones that's in the back.</p>	<p>1 working with someone that someone was terminated</p> <p>2 for harassment of inmates?</p> <p>3 A. No.</p> <p>4 Q. Okay. Were you a supervising CO, that</p> <p>5 is to say when new COs started, were there any put</p> <p>6 under you for oversight?</p> <p>7 A. No.</p> <p>8 Q. Did you ever receive any writeups at</p> <p>9 all, that you know of?</p> <p>10 A. Probably did, yeah.</p> <p>11 Q. What for?</p> <p>12 A. They wasn't handheld. We just went into</p> <p>13 the office and, you know, different little things.</p> <p>14 Q. Yeah. Can you give us some ideas?</p> <p>15 A. Harassing of a inmate -- you know, like</p> <p>16 talking crazy to a inmate, the inmate writing you</p> <p>17 up because they want to write you up.</p> <p>18 Q. Did that happen with you on any</p> <p>19 particular occasion?</p> <p>20 A. Yeah, it have.</p> <p>21 Q. All right. Did the inmates -- did you</p> <p>22 ever know which inmate?</p> <p>23 A. No.</p> <p>24 Q. Did they talk about more than just you,</p> <p>25 but a bunch of folks who were harassing them?</p>
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<p>1 Q. Okay. Are there specific COs whose job</p> <p>2 is to not monitor, for example, video screens, but</p> <p>3 actually walk the floors; or is that something</p> <p>4 everybody does?</p> <p>5 A. The COs do it. The one that's in</p> <p>6 control of two.</p> <p>7 Q. Control two.</p> <p>8 So that would be the group that would be</p> <p>9 responsible for not looking at the towers, but</p> <p>10 getting down there and looking at stuff?</p> <p>11 A. Yes, sir.</p> <p>12 Q. And what was your -- as a CO you worked</p> <p>13 all of those roles?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Okay. Now, was there ever an occasion</p> <p>16 in which you were working at the Facility when you</p> <p>17 might have had a medical problem that you had any</p> <p>18 ambulances called for; did that ever happen?</p> <p>19 A. For me?</p> <p>20 Q. Yes, ma'am.</p> <p>21 A. No, sir.</p> <p>22 Q. Okay. Fair enough. Now I know.</p> <p>23 There's five folks and I'm getting that -- that</p> <p>24 makes sense.</p> <p>25 Were there any occasions when you were</p>	<p>1 MR. RHODES: Object to the form.</p> <p>2 Q. (By Mr. Carpenter) If you know.</p> <p>3 A. No, I don't.</p> <p>4 Q. And I'll sort of clarify by that. For</p> <p>5 example, did you ever have a complaint from a</p> <p>6 supervisor where an inmate might have said hey,</p> <p>7 Ms. Blake and two other COs were bothering me?</p> <p>8 A. No.</p> <p>9 Q. All right. How many -- how many times</p> <p>10 do you recall being asked by a supervisor or</p> <p>11 someone over you regarding harassing an inmate?</p> <p>12 A. Probably once or twice.</p> <p>13 Q. Gotcha.</p> <p>14 And tell me, on those occasions, do you</p> <p>15 recall the supervisor that talked to you?</p> <p>16 A. I went to talk to the warden.</p> <p>17 Q. And that's Warden Kaho?</p> <p>18 A. Yes.</p> <p>19 Q. What did he say?</p> <p>20 A. He just told me not to tone my voice,</p> <p>21 the way I talked to the guys.</p> <p>22 Q. So it was more -- and he didn't say</p> <p>23 anything about what you were saying to them?</p> <p>24 A. No, he just told me I need to get -- you</p> <p>25 know, just control my mouth.</p>

4 (Pages 10 to 13)

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<p>1 Q. And because I've been in military, I</p> <p>2 kind of know what that means. Did he mean you</p> <p>3 were saying things to them that were bothering</p> <p>4 them or was it just your -- like drill sergeant?</p> <p>5 A. Yeah, the way I deliver it. My</p> <p>6 delivery.</p> <p>7 Q. Was it too forceful or too light?</p> <p>8 A. It's like I'm more aggressive.</p> <p>9 Q. Did he ever say that there was a</p> <p>10 question about ever using any cussing or --</p> <p>11 A. No.</p> <p>12 Q. None of that. Got it.</p> <p>13 And what was your response to that?</p> <p>14 A. I just told him, okay, I'll get better.</p> <p>15 Q. Fair enough.</p> <p>16 And you never got anything in writing</p> <p>17 from anybody at the Facility?</p> <p>18 A. No. Nothing but that termination</p> <p>19 letter.</p> <p>20 Q. But nothing regarding discipline --</p> <p>21 A. No.</p> <p>22 Q. Okay. And no -- the Sheriff, himself,</p> <p>23 never came down and said anything about this?</p> <p>24 A. No. Never did come over there, talk to</p> <p>25 you.</p>	<p>1 call that Shawn Jones paid for your gas. I say,</p> <p>2 what? I said, paid for my gas? I say no, that</p> <p>3 man didn't pay for my gas.</p> <p>4 Q. Right.</p> <p>5 A. And he said, you got me. I was like,</p> <p>6 this man ain't pay for my gas. And my thing is</p> <p>7 this, he didn't know whether I'm screwing this man</p> <p>8 or not. That wasn't a job of his to call me and</p> <p>9 ask me a question.</p> <p>10 Q. Right. But that didn't have -- that</p> <p>11 particular thing had no ways, nothing to do with</p> <p>12 him being a nice guy and pumping your gas at the</p> <p>13 gas station?</p> <p>14 A. That's it.</p> <p>15 Q. And he didn't pay for any of it?</p> <p>16 A. He didn't pay for nothing. My grandbaby</p> <p>17 was in the car and that was a help for me, for him</p> <p>18 to stand there and pump my gas and make sure my</p> <p>19 grandbaby was safe too.</p> <p>20 Q. Did you know Mr. Jones before?</p> <p>21 A. Yes, we are classmates. We went to</p> <p>22 school together.</p> <p>23 Q. Now, Sheriff Bailey was not in y'all's</p> <p>24 class?</p> <p>25 A. No.</p>
Page 15	Page 17
<p>1 Q. All right. Now, this is what I was --</p> <p>2 when I mentioned pumping gas. Tell me about the</p> <p>3 pumping gas incident.</p> <p>4 A. Well, one day I was pumping gas. And</p> <p>5 this other guy that used to work there, his name</p> <p>6 is Sergeant Robinson, he was on the opposite side</p> <p>7 of the pump. And I had my grandbaby in the car.</p> <p>8 But upon me getting out of my car, Mr. Jones</p> <p>9 pulled up. And I got ready to walk in the store,</p> <p>10 but I was talking to Sergeant Robinson at the same</p> <p>11 time.</p> <p>12 Q. Right.</p> <p>13 A. And when I was walking in the store,</p> <p>14 Mr. Jones was interacting with Sergeant Robinson,</p> <p>15 and he asked me did I want him to -- he say he'll</p> <p>16 pump my gas. He didn't ask me. He said I'll pump</p> <p>17 your gas for you while you gone in the store. And</p> <p>18 I say hold up, let me see how much I'm going to</p> <p>19 get before you pump it. And I told him \$9. And I</p> <p>20 went on in the store and pumped the gas. When I</p> <p>21 came back out, Mr. Jones was back in his truck.</p> <p>22 He didn't say anything else to me.</p> <p>23 Q. Right.</p> <p>24 A. At about 6:42 that evening, my phone</p> <p>25 rung. It was Sheriff Bailey. He said, I got a</p>	<p>1 Q. Shawn was?</p> <p>2 A. Yes.</p> <p>3 Q. Gotcha.</p> <p>4 So you -- and there's nothing wrong with</p> <p>5 this. You've been friends off and on with Shawn</p> <p>6 because you were classmates?</p> <p>7 A. Yes.</p> <p>8 Q. So he comes up and he offers to pump the</p> <p>9 gas; and as you told him, don't do it until I tell</p> <p>10 you how many dollars?</p> <p>11 A. Yes.</p> <p>12 Q. \$9. And then you got a call from</p> <p>13 Sheriff Bailey about it?</p> <p>14 A. Sheriff Bailey.</p> <p>15 Q. And basically, you told him what you</p> <p>16 told him. And at that point, he was left with the</p> <p>17 impression that he did not pay for your gas?</p> <p>18 A. That's it.</p> <p>19 Q. Was that the end of that conversation?</p> <p>20 A. That was the end of that conversation.</p> <p>21 Q. Now --</p> <p>22 A. No, he went on asking me did I have his</p> <p>23 support -- did he have my support and I told him</p> <p>24 yeah.</p> <p>25 Q. Because at that point, he's just pumping</p>

5 (Pages 14 to 17)

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<p>1 gas. It wasn't like he was paying for your car?</p> <p>2 A. No.</p> <p>3 Q. And so was there anything -- because</p> <p>4 that would have been, as I read paragraph 62, that</p> <p>5 was between the -- when I say then primary</p> <p>6 general -- first primary election and then the</p> <p>7 runoff?</p> <p>8 A. Yes.</p> <p>9 Q. When the runoff was down to the Sheriff</p> <p>10 and Shawn Jones?</p> <p>11 A. Yes.</p> <p>12 Q. And so after the runoff was over with,</p> <p>13 it says paragraph 63, "Sheriff Bailey said he was</p> <p>14 going to have Bonita Blake drug tested." Did he</p> <p>15 tell you that?</p> <p>16 A. No.</p> <p>17 Q. Okay. Who did he tell?</p> <p>18 A. Somebody came to me and told me that</p> <p>19 Sheriff Bailey said he was going to have me drug</p> <p>20 tested.</p> <p>21 Q. Were you drug tested?</p> <p>22 A. No.</p> <p>23 Q. All right. Because it also goes on to</p> <p>24 say Sheriff Bailey was going to use the drug test</p> <p>25 as a pretext for firing you.</p>	<p>1 All right. So then he says, "Sheriff</p> <p>2 Bailey told people in the community he had to get</p> <p>3 rid of the snakes in the Facility."</p> <p>4 A. Yes.</p> <p>5 Q. Did you hear him say that?</p> <p>6 A. No. Too many peoples in the community</p> <p>7 and peoples in the office came to me and told me.</p> <p>8 Q. Okay. And then -- and the reason -- and</p> <p>9 Carroll knows -- we're looking to see what you</p> <p>10 heard and then what others heard. Who in the</p> <p>11 community told you that that's what the Sheriff</p> <p>12 had said?</p> <p>13 A. Samantha Jackson. She's the tax</p> <p>14 assessor. Gene Stampley. He owns a little corner</p> <p>15 store right beside the Sheriff Department.</p> <p>16 Q. Now, is he related to Derrick Stampley?</p> <p>17 A. No, I don't think so.</p> <p>18 Q. Because if I'm not mistaken, he was also</p> <p>19 running. There was a Derrick Stampley running?</p> <p>20 A. Yes, Derrick Stampley. That's another</p> <p>21 classmate.</p> <p>22 Q. But there's no relation?</p> <p>23 A. No.</p> <p>24 Q. All right. Fair enough.</p> <p>25 A. I can't answer that question because I</p>
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<p>1 A. Okay.</p> <p>2 Q. But he didn't tell you that?</p> <p>3 A. No, he didn't.</p> <p>4 Q. I know it's a close knit community. Who</p> <p>5 basically did say --</p> <p>6 A. My son, DeAnthony Blake.</p> <p>7 Q. Now, did your son work there?</p> <p>8 A. No, he heard -- people was talking to</p> <p>9 him about it.</p> <p>10 Q. Gotcha.</p> <p>11 This is the way every small town in the</p> <p>12 state of Mississippi works. It should be in the</p> <p>13 city charter.</p> <p>14 And so he -- but it did get back to you</p> <p>15 --</p> <p>16 A. Yes, it did.</p> <p>17 Q. -- because that's where it was going?</p> <p>18 But, in fact, he didn't do the drug</p> <p>19 test?</p> <p>20 A. No. And I was still employed at the</p> <p>21 time.</p> <p>22 Q. That's right. Because this would have</p> <p>23 been before December 31?</p> <p>24 A. Yes.</p> <p>25 Q. Got it. Okay.</p>	<p>1 don't know who's kin and who's not.</p> <p>2 Q. Now, it indicates, paragraph 66, "Bonita</p> <p>3 Blake actively supported another candidate other</p> <p>4 than James Bailey." Is that -- do you recall?</p> <p>5 A. No.</p> <p>6 Q. You voted?</p> <p>7 A. Yes.</p> <p>8 Q. Whatever you voted, and it really</p> <p>9 doesn't matter, but you just voted?</p> <p>10 A. Yes.</p> <p>11 Q. But no yard signs?</p> <p>12 A. No.</p> <p>13 Q. Because as Carroll knows, door knocking,</p> <p>14 no phone --</p> <p>15 A. No.</p> <p>16 Q. Gotcha. Okay.</p> <p>17 A. And Lieutenant Terry Ware, with the</p> <p>18 statement about he was getting rid of the people,</p> <p>19 because we would go on a run, transportation, and</p> <p>20 he would be talking about it.</p> <p>21 Q. And Lieutenant Terry Ware, he's in</p> <p>22 charge of transportation?</p> <p>23 A. Yes.</p> <p>24 Q. And where would he be in the chain of</p> <p>25 command?</p>

6 (Pages 18 to 21)

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<p>1 A. He's a lieutenant.</p> <p>2 Q. Okay. Because we were saying before,</p> <p>3 there's --</p> <p>4 A. He comes up under -- he comes after --</p> <p>5 it's the sergeant, the lieutenant. Then you got</p> <p>6 the captain, the major, the deputy warden and the</p> <p>7 warden.</p> <p>8 Q. Correct.</p> <p>9 And so what was his job role as</p> <p>10 lieutenant?</p> <p>11 A. He did -- he was a night shift</p> <p>12 lieutenant.</p> <p>13 Q. I follow you. So whereas you've got</p> <p>14 Ms. Smith as lieutenant for that shift, he was a</p> <p>15 lieutenant for another shift?</p> <p>16 A. Yes, sir.</p> <p>17 Q. Follow you.</p> <p>18 And then he would report to the captain</p> <p>19 and on up the chain from there?</p> <p>20 A. Yes, sir.</p> <p>21 Q. Okay. Now, after the primary election,</p> <p>22 the runoff -- because as we were saying before,</p> <p>23 just like in Long Beach, if it's the republican</p> <p>24 primary, there ain't no general election. So in</p> <p>25 Fayette, in Jefferson County, in the democratic,</p>	<p>1 election.</p> <p>2 Q. That's what I wanted to focus on.</p> <p>3 So he specifically mentioned the</p> <p>4 support -- and let me ask this question: When was</p> <p>5 that meeting?</p> <p>6 A. I can't recall it.</p> <p>7 Q. Sometime in '23?</p> <p>8 A. Yeah, sometime in '23.</p> <p>9 Q. Okay. And then there was -- okay. And</p> <p>10 he did mention support election?</p> <p>11 A. Yes.</p> <p>12 Q. And that -- did he also mention that he</p> <p>13 needed support in the running of the Facility so</p> <p>14 he could go lobby for more cash?</p> <p>15 A. Yes.</p> <p>16 Q. More specifically, a higher per diem for</p> <p>17 the inmates?</p> <p>18 A. Yes, to get us a raise.</p> <p>19 Q. That's right.</p> <p>20 Was he able to do that, in terms of</p> <p>21 giving y'all a raise?</p> <p>22 A. Yes, I received one.</p> <p>23 Q. Gotcha. All right.</p> <p>24 And once -- other than that mandatory</p> <p>25 meeting, though, he didn't say anything more to</p>
Page 23	Page 25
<p>1 there ain't no general election here. So that was</p> <p>2 it after the primary was over?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Did Sheriff Bailey mention anything to</p> <p>5 you between the end of that runoff election and</p> <p>6 December 31st about your participation, helping</p> <p>7 him out in an election?</p> <p>8 A. No.</p> <p>9 Q. Were you in attendance -- because I know</p> <p>10 Ms. McComb just mentioned that there was -- and I</p> <p>11 think it was Ms. McComb -- that there was a</p> <p>12 mandatory meeting?</p> <p>13 A. Yes, sir.</p> <p>14 Q. Were you present for that?</p> <p>15 A. Yes, sir.</p> <p>16 Q. What did he say?</p> <p>17 A. Well, he was talking about the ACA, the</p> <p>18 election, and he was talking about the raise,</p> <p>19 about the amount of inmates he needed to get to</p> <p>20 get the raise for us.</p> <p>21 Q. Right.</p> <p>22 A. He was going to some kind of meeting in</p> <p>23 Jackson and all these different places to get</p> <p>24 raises for us. And talking about the support that</p> <p>25 he needed from his workers for him in the</p>	<p>1 you about supporting him?</p> <p>2 A. No.</p> <p>3 Q. Did anybody else?</p> <p>4 A. No.</p> <p>5 Q. Okay. And so when you got -- and did</p> <p>6 you have to reinterview?</p> <p>7 A. Yes.</p> <p>8 Q. And did he mention the election in that</p> <p>9 interview?</p> <p>10 A. Yes.</p> <p>11 Q. What did he say?</p> <p>12 A. Well, see, my interview, I had to go</p> <p>13 over for a complaint about another person.</p> <p>14 Q. What was that?</p> <p>15 A. I was having a problem with Ms. McComb.</p> <p>16 Q. Okay.</p> <p>17 A. And when I went in, I was telling him</p> <p>18 about the problem, and he made the statement that</p> <p>19 he had been getting complaints about Ms. McComb.</p> <p>20 Q. Okay.</p> <p>21 A. And that I wouldn't have that problem to</p> <p>22 worry about no longer because he was going to take</p> <p>23 care of the issue.</p> <p>24 Q. Did he say how he was going to take care</p> <p>25 of it?</p>

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<p>1 A. He didn't say how he was going to take</p> <p>2 care of it. He said he was going to take care of</p> <p>3 it.</p> <p>4 Q. And what were the complaints?</p> <p>5 A. Scandalizing my name.</p> <p>6 Q. Let me make sure I understand that. I</p> <p>7 think I do, but let me make sure.</p> <p>8 So, you were telling the Sheriff that</p> <p>9 she was saying negative things about you?</p> <p>10 A. Yes, that wasn't true.</p> <p>11 Q. All right. And his response was -- and</p> <p>12 was it related to your work at the Facility?</p> <p>13 A. Yes.</p> <p>14 Q. And his response was, "I'm going to take</p> <p>15 care of that"?</p> <p>16 A. Yes, sir. He said he had been getting</p> <p>17 too many complaints about Ms. McComb.</p> <p>18 Q. And did he mention what those complaints</p> <p>19 were?</p> <p>20 A. No.</p> <p>21 Q. Now, did -- and I'm putting all this</p> <p>22 together in terms of who worked for what, where.</p> <p>23 Were you on the same shift with</p> <p>24 Ms. McComb?</p> <p>25 A. No.</p>	<p>1 deputy came over. And he called Mr. Ellis first.</p> <p>2 And after Mr. Ellis went down there, he called for</p> <p>3 me to come down there to intake. And when we made</p> <p>4 it to intake, he said I have a letter for you. He</p> <p>5 say you sign right here, so I signed for the</p> <p>6 letter. And when I opened the letter, I read it.</p> <p>7 And it said that my termination -- and then it</p> <p>8 said if you have any questions, you can contact</p> <p>9 Sheriff Bailey.</p> <p>10 Q. Right.</p> <p>11 A. So I asked my sergeant could I go up</p> <p>12 front to use the phone to call Sheriff Bailey. No</p> <p>13 answer. I called him the next day. No answer. I</p> <p>14 still have yet to this day to talk to Sheriff</p> <p>15 Bailey about why he terminated me.</p> <p>16 Q. Right.</p> <p>17 Okay. Did anyone else, other than</p> <p>18 Sheriff Bailey, give you an idea of why you might</p> <p>19 have been terminated?</p> <p>20 A. Because I didn't vote for him.</p> <p>21 Q. Okay. Now, as I understand it, did he</p> <p>22 ask you before the election if you were going to</p> <p>23 vote for him?</p> <p>24 A. Yes, he did.</p> <p>25 Q. Where was that? Because I know</p>
Page 27	Page 29
<p>1 Q. But you were hearing these from other</p> <p>2 correction officers?</p> <p>3 A. What?</p> <p>4 Q. You were hearing things that Ms. McComb</p> <p>5 might have been saying about you from other</p> <p>6 officers?</p> <p>7 A. Yes.</p> <p>8 Q. To your knowledge, none of this was</p> <p>9 written up that you ever saw by anybody, like a</p> <p>10 document?</p> <p>11 A. No.</p> <p>12 Q. And we were talking about when you were</p> <p>13 with the warden he was like use an indoor voice.</p> <p>14 I'm joking because I'm thinking Barney the</p> <p>15 Dinosaur. But, you know, use a softer tone. That</p> <p>16 wasn't written up either.</p> <p>17 A. No.</p> <p>18 Q. And you just said you'll work on it and</p> <p>19 that was the end of that?</p> <p>20 A. Yes.</p> <p>21 Q. Did the Sheriff say anything to you</p> <p>22 after -- I say termination, but after you weren't</p> <p>23 rehired?</p> <p>24 A. The day we -- I worked the whole shift.</p> <p>25 And right before we got ready to get off, the</p>	<p>1 somewhere around the gas pumping incident.</p> <p>2 A. He asked me during the gas -- when he</p> <p>3 called me on the phone. And then one day I was</p> <p>4 parking my car and he had walked out there, but he</p> <p>5 was talking to someone else. And then he walked</p> <p>6 over to my car and he said, I've got your vote,</p> <p>7 right, Hometown. Because we stay in the same</p> <p>8 little hometown. And I answered yes. And that</p> <p>9 was it.</p> <p>10 Q. And I'm being picky, because that's what</p> <p>11 lawyers do. You know, so that's all right.</p> <p>12 Carroll's good at it too.</p> <p>13 So, you actually told him that you were</p> <p>14 supporting him?</p> <p>15 A. Yeah.</p> <p>16 Q. But if I understand it, somehow, some</p> <p>17 way he found out you weren't?</p> <p>18 A. Yes.</p> <p>19 Q. And that's what he acted on?</p> <p>20 A. Yes.</p> <p>21 Q. Fair enough. I get it.</p> <p>22 Do you recall writing any letters or</p> <p>23 anything, because I'm not seeing it, but I want to</p> <p>24 make sure. Did you file a grievance?</p> <p>25 A. No. Because it was after the timeframe,</p>

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<p>1 you know, the 10 days you have to file a 2 grievance. 3 Q. Right. 4 A. And when I found out about it, it was, 5 you know, past the timeframe for you to file your 6 grievance. 7 Q. Got it. All right. 8 A. And then they was talking about 9 something in the handbook, that you -- dealing 10 with the grievance and stuff like that. 11 Q. Absolutely. 12 Going to your interrogatories -- and 13 yeah, we're going to be done by noon. 14 (Off the record conversation.) 15 Q. (By Mr. Carpenter) Who is Joyce Lee? 16 A. She was the nurse. 17 Q. The nurse at the Correctional Facility? 18 A. Yes, sir. 19 Q. Did she tell you that she'd heard that 20 Sheriff Denton{sic} was going to do something to 21 you? 22 A. She was just talking in general about 23 the -- Sheriff Bailey, how he was going to get rid 24 of the snakes. 25 Q. Okay.</p>	<p>1 Q. And how were you injured? 2 A. My knee, my shoulder and my head. 3 Q. All right. Was there a period of time 4 you couldn't work because of those injuries? 5 A. No. When I had my surgery on my knee I 6 couldn't work. 7 Q. And that was for about two weeks or a 8 month? 9 A. Yeah, two weeks. 10 Q. And did that have to go to court, like 11 went to a trial? 12 A. Yes, we went to trial. 13 Q. All right. And you recovered? 14 A. Yes, sir. 15 Q. Who was the attorney on that one for 16 you? 17 A. Morgan and Morgan. 18 Q. Oh, I know them well. 19 Do you know the attorney that worked for 20 you? 21 A. Will -- I had Will, Paul and -- Paul 22 Ott, Will -- it was another one. I had one more. 23 Q. Gotcha. Yeah, I know them. 24 (Off the record conversation.) 25 A. And Rocky.</p>
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<p>1 A. Because when I went for my interview, he 2 sat with his phone just like this (indicating). 3 He was talking, "I got to get rid of the people 4 that's not here to support me." 5 Q. And he told you that? 6 A. Yes. 7 Q. And that would have been in the 8 reinterview? 9 A. Yes. 10 Q. And did he elaborate when he said 11 "didn't support me," as in? 12 A. People that didn't have his back. 13 Q. Did he mention the election? 14 A. No. 15 Q. All right. But that's what you 16 understood him to mean? 17 A. Yes. 18 Q. Now, in 2024, you were in a traffic 19 accident with a log truck? 20 A. In 2019. I had a case. My case went to 21 court in 2024. 22 Q. I got it. 23 What happened -- and what happened in 24 that lawsuit? 25 A. I won my case.</p>	<p>1 Q. Rocky Wilkins. 2 A. Yeah. 3 Q. He does a lot of premises work, too. 4 Now, in Interrogatory Number 13 -- these 5 are interrogatories you recall answering. And it 6 said, "I supported candidate Shawn Jones for 7 sheriff" when it says, "Please identify the 8 candidate you supported instead of Sheriff 9 Bailey," because you had mentioned that in your 10 answers. But you supported him, but you didn't 11 say anything about it? 12 A. No. 13 Q. Which is fine. Because as I think 14 Ms. McComb said, "Who I vote for is my own doggone 15 business." 16 A. Yeah. 17 Q. Did you do any -- and you also 18 mentioned, other than voting, you didn't get 19 actively involved in the election? 20 A. Huh-huh. (Negative response.) 21 Q. Now, one of the claims that you had made 22 is for emotional distress. When did you feel your 23 emotional distress get better? 24 A. It hasn't gotten better. 25 Q. Okay. So we do this for physical pain,</p>

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<p>1 and having been in a truck accident you'll know 2 exactly because your lawyers probably did it too. 3 You use a term 0 to 10, 0 being I never had that 4 accident; I'm fine. 10 of 10, I need to be in 5 emergency today but I got to be here instead. And 6 it's a range that we use to try to gather the 7 intensity of pain. You can use it for physical, 8 but you can use it for emotional too. 9 In January of 2024, what would you feel 10 your anxiety, your depression, your emotional 11 distress was relating to the Facility? 12 A. Sleep. 13 Q. What? 14 A. Sleep. I can't sleep. My body is set 15 to a time. 16 Q. Right. 17 A. And it was like 4:00 in the morning I'm 18 getting for work to get to be at work at 5:45. 19 And my body's still having to adapt to, you know, 20 everyday life. You know, at 4:00, I'm up. I 21 can't go back to sleep. I'm -- you know, and it's 22 depressing because I'm not getting enough hours of 23 rest. 24 Q. And on a scale of 0 to 10 -- and we're 25 going to try to figure out if it's getting better,</p>	<p>1 everyday life. Get prepared. Because I have a 2 grandbaby and I gets her up for school. So, I get 3 up and get her prepared for school. Because my 4 daughter, she works at night. That's my -- I just 5 balance my everyday life with whatever I have to 6 do. 7 Q. Now, in the log truck accident, with 8 Rocky and everybody, did you have to give a 9 deposition? 10 A. Yes, sir, I did. 11 Q. All right. Has that case settled? 12 A. Yes, sir, it has. 13 Q. All right. Did you have to give live 14 testimony when you went to trial? 15 A. No, I didn't -- we went to trial and we 16 just settled out of court before. The other -- 17 the plaintiff{sic} testified. They went up first. 18 And then when it got to be -- we just settled out 19 of court. 20 Q. Were you a plaintiff in that trucking 21 case in the log truck case? 22 A. Yes. 23 Q. Was there more than one plaintiff? 24 A. Just me. 25 Q. Just you. Okay.</p>
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<p>1 if it's not getting better, where the intensity 2 is. But the month after this happened, where 3 would you have been on anxiety and depression? 0 4 of 10 being okay; 10 of 10 being I need to be in a 5 emergency room. Where would you fit -- 6 A. About a seven. 7 Q. And we're just going arbitrarily 8 numbers. There's no -- but it's a good signpost. 9 So we get from January '24, December 10 '24. Now we're a year away from when this 11 happened. What would you say the intensity of it 12 would be in December of '24, yeah, end of '24? 13 A. Getting better? 14 Q. Yes. 15 A. It's not getting better. 16 Q. So, we're still at a seven? 17 A. Yeah. 18 Q. We are now in April of '25. Would you 19 still say it's a seven? 20 A. It's a seven. 21 Q. Have you been to any -- and I know we 22 talked about you have no medical records? 23 A. No. 24 Q. So, how are you dealing with it? 25 A. Everyday just get on up and start my</p>	<p>1 So, typically -- usually plaintiff goes 2 first, then defense. But you didn't get to the 3 point in your case, your side of the case, where 4 you had to testify? 5 A. Yes. 6 Q. In other words, they settled on the 7 courthouse steps? 8 A. Yes. 9 Q. So the only thing that would be there 10 would have been a deposition taken at some point? 11 A. Yes. 12 Q. And where was that filed? 13 A. The case? 14 Q. The lawsuit, yeah. 15 A. In Claiborne County. 16 Q. Claiborne County. Okay. 17 All right. Now, were you -- again, 18 we're going specifically from December 31 of '23, 19 when you got let go, to, let's say, throughout 20 2024. Were you still having physical pain from 21 that trucking accident? 22 A. Yes, I still have it now. 23 Q. Gotcha. 24 Where does it hurt now? 25 A. In my leg and in my back.</p>

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<p>1 Q. Has your shoulder gotten better?</p> <p>2 A. Yes.</p> <p>3 Q. All right. And are you treating</p> <p>4 medically for your physical pain from the trucking</p> <p>5 accident?</p> <p>6 A. No.</p> <p>7 Q. All right. When's the last time you</p> <p>8 went to a doctor regarding your -- the log truck</p> <p>9 case?</p> <p>10 A. It's been a long -- it's been a minute.</p> <p>11 Q. Because it was back in 2019?</p> <p>12 A. Yes, sir.</p> <p>13 Q. Have you had, between 2019 and now, any</p> <p>14 workers' comp injuries?</p> <p>15 A. No, sir.</p> <p>16 Q. So this is really the only one you had?</p> <p>17 A. Yes, sir.</p> <p>18 Q. And do you -- do you have children that</p> <p>19 live with you?</p> <p>20 A. Yes, sir.</p> <p>21 Q. How many children do you have?</p> <p>22 A. I have three kids. But my daughter and</p> <p>23 granddaughter stay with me.</p> <p>24 Q. So while you're at work, they're taking</p> <p>25 care of the kids?</p>	<p>1 A. What I can remember is, when the phone</p> <p>2 rung, I answered the phone. And I say -- well,</p> <p>3 when I seen the number, I say Sheriff Bailey, what</p> <p>4 he want, what I done did. So when I answered the</p> <p>5 phone, he say, Hey, Ms. Blake. I say, Hey,</p> <p>6 Sheriff Bailey, how you doing. I say what I done</p> <p>7 did wrong. He say, nothing. He say, I got</p> <p>8 something to ask you. I say, what is it. He say</p> <p>9 I got a call that Mr. Jones paid for your gas. I</p> <p>10 say, what. I say, no, he didn't pay for my gas.</p> <p>11 I said, I paid for my own gas. I say Sergeant</p> <p>12 Robinson was standing on the other side and that</p> <p>13 man pulled up. He was talking to Sergeant</p> <p>14 Robinson at first. And when I got ready to go in</p> <p>15 the store, he told me he will pump my gas. And I</p> <p>16 say he pumped my gas and that was it. Me and him</p> <p>17 didn't talk to each other.</p> <p>18 That was it. That was the end of the</p> <p>19 conversation.</p> <p>20 Q. Did Sheriff Bailey say anything else?</p> <p>21 A. That's it.</p> <p>22 Q. And who do you recall telling you that</p> <p>23 he said he was going to get rid of the snakes?</p> <p>24 A. My son, the tax assessor, Samantha</p> <p>25 Jackson, Gene Stampley, and, like I say,</p>
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<p>1 A. Yes.</p> <p>2 Q. And does your daughter work?</p> <p>3 A. Yes.</p> <p>4 Q. So you're working and she's working and</p> <p>5 y'all are maintaining the household?</p> <p>6 A. Yes, sir.</p> <p>7 Q. Excellent. All right.</p> <p>8 I think that's all I've got.</p> <p>9 MR. CARPENTER: Carroll?</p> <p>10 EXAMINATION BY MR. RHODES:</p> <p>11 Q. Let me ask you about the Sheriff.</p> <p>12 Why do you think he thought that you did</p> <p>13 not support him?</p> <p>14 MR. CARPENTER: Objection.</p> <p>15 THE WITNESS: The day Shawn Jones pumped</p> <p>16 my gas.</p> <p>17 MR. CARPENTER: Objection, but of course</p> <p>18 you can go ahead and answer. He already knows.</p> <p>19 Q. (By Mr. Rhodes) When did the sheriff</p> <p>20 call you, that next morning?</p> <p>21 A. That same that day, that evening. At</p> <p>22 6:42 that evening.</p> <p>23 Q. Tell us exactly what he said to you</p> <p>24 about that incident about Shawn Jones pumping your</p> <p>25 gas.</p>	<p>1 Lieutenant Ware. He would say when we would go on</p> <p>2 the runs, like the transportation.</p> <p>3 Q. And did all of them tell you at one</p> <p>4 meeting or at different times?</p> <p>5 A. At different times.</p> <p>6 Q. Over what period of time did you hear</p> <p>7 that?</p> <p>8 A. The whole time --</p> <p>9 Q. The election was --</p> <p>10 A. Yeah.</p> <p>11 Q. So, over a two or three-month period?</p> <p>12 A. Two or three-month period, six months.</p> <p>13 Still until this day you hear it. When you go in</p> <p>14 the store you still hear it.</p> <p>15 Q. Okay.</p> <p>16 EXAMINATION BY MR. CARPENTER:</p> <p>17 Q. Which raises a good question: Are you</p> <p>18 claiming that you have any humiliation or loss of</p> <p>19 reputation from this?</p> <p>20 A. Yes.</p> <p>21 Q. But on the other hand, everyone you know</p> <p>22 is telling you that you were let go not for</p> <p>23 anything you did, but because you didn't -- you</p> <p>24 just didn't happen to support him?</p> <p>25 A. Yes.</p>

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<p>1 Q. And that by itself, in your mind, is not</p> <p>2 something that's wrong, because you have the right</p> <p>3 to choose whomever you want?</p> <p>4 A. Yes.</p> <p>5 Q. But you're hearing about that from</p> <p>6 people saying he let you go because you didn't</p> <p>7 support him?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And if I understand you</p> <p>10 correctly, you have a right to support whoever you</p> <p>11 want to?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. Fair enough.</p> <p>14 That's all the questions I have.</p> <p>15 A. And I went to the library Friday, this</p> <p>16 Friday just passed. Nancy Green was there. And</p> <p>17 she was talking about how the peoples been coming</p> <p>18 in the library talking about how Sheriff Bailey</p> <p>19 did the workers. It's still going on. It's not</p> <p>20 hush, hush. Everybody is still talking about it.</p> <p>21 Q. That's right. I follow you.</p> <p>22 And your understanding that, from Nancy</p> <p>23 Green is, it's Sheriff Bailey that's doing things</p> <p>24 wrong?</p> <p>25 A. Yes.</p>	<p>1 CERTIFICATE OF DEPONENT</p> <p>2 DEPONENT: BONITA BLAKE</p> <p>3 DATE: April 18, 2025</p> <p>4 CASE STYLE: Smith, et al vs. Jefferson County,</p> <p>5 Mississippi, et al</p> <p>6 ORIGINAL TO: MR. CARPENTER, ESQ.</p> <p>7 I, the above-named deponent in the</p> <p>8 deposition taken in the herein styled and numbered</p> <p>9 cause, certify that I have examined the deposition</p> <p>10 taken on the date above as to the correctness</p> <p>11 thereof, and that after reading said pages, I find</p> <p>12 them to contain a full and true transcript of the</p> <p>13 testimony as given by me.</p> <p>14 Subject to those corrections listed below,</p> <p>15 if any, I find the transcript to be the correct</p> <p>16 testimony I gave at the aforestated time and place.</p> <table border="1"><thead><tr><th>Page</th><th>Line</th><th>Comments</th></tr></thead><tbody><tr><td>17</td><td></td><td></td></tr><tr><td>18</td><td></td><td></td></tr><tr><td>19</td><td></td><td></td></tr><tr><td>20</td><td></td><td></td></tr><tr><td>21</td><td></td><td></td></tr><tr><td>22</td><td></td><td></td></tr><tr><td>23</td><td></td><td></td></tr><tr><td>24</td><td></td><td></td></tr><tr><td>25</td><td></td><td></td></tr></tbody></table> <p>17 This the ____ day of _____, 2025.</p> <p>18 _____</p> <p>19 BONITA BLAKE</p> <p>20 State of Mississippi</p> <p>21 County of _____</p> <p>22 Subscribed and sworn to before me, this the</p> <p>23 ____ day of _____, 2025.</p> <p>24 My Commission Expires: _____</p> <p>25 _____</p> <p>Notary Public</p>	Page	Line	Comments	17			18			19			20			21			22			23			24			25		
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<p>1 Q. She's not coming back to report that</p> <p>2 you're doing anything wrong?</p> <p>3 A. No.</p> <p>4 Q. Fair enough. That's all I got.</p> <p>5 (Time Noted: 12:05 p.m.)</p> <p>6 SIGNATURE/NOT WAIVED</p> <p>7</p> <p>8 ORIGINAL: MR. CARPENTER, ESQ.</p> <p>9 COPY: MR. RHODES, ESQ.</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 CERTIFICATE OF COURT REPORTER</p> <p>2 I, Robin G. Burwell, Court Reporter and</p> <p>3 Notary Public, in and for the State of Mississippi,</p> <p>4 hereby certify that the foregoing contains a true</p> <p>5 and correct transcript of the testimony of BONITA</p> <p>6 BLAKE, as taken by me in the aforementioned matter</p> <p>7 at the time and place heretofore stated, as taken by</p> <p>8 stenotype and later reduced to typewritten form</p> <p>9 under my supervision by means of computer-aided</p> <p>10 transcription.</p> <p>11 I further certify that under the authority</p> <p>12 vested in me by the State of Mississippi that the</p> <p>13 witness was placed under oath by me to truthfully</p> <p>14 answer all questions in the matter.</p> <p>15 I further certify that, to the best of my</p> <p>16 knowledge, I am not in the employ of or related to</p> <p>17 any party in this matter and have no interest,</p> <p>18 monetary or otherwise, in the final outcome of this</p> <p>19 matter.</p> <p>20 Witness my signature and seal this the</p> <p>21 30th day of April, 2025.</p> <p>22 _____</p> <p>23 ROBIN G. BURWELL, #1651</p> <p>24 CRR, RPR, CCR</p> <p>25 My Commission Expires:</p> <p>April 6, 2029</p>																														